



Sara K. Gould
President and CEO

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Federal Communications Commission

Via Internet Site: http://gulfoss2.fcc.gov/prod/ecfs/upload_v2.cgi

Dear Commissioners Powell, Abernathy, Copps, Martin, and Adelstein:

As the first and the leading national women's fund, which has fought for the empowerment of women and the amplification of our unique voices for the past 32 years, the Ms. Foundation for Women, Inc. respectfully submits these comments regarding **MB Docket No.04-207, a proceeding to examine cable a la carte**. The Ms. Foundation for Women understands the power of the media in American society to positively impact women's lives. Increased access and exposure to the media alerts women when their rights are at risk, promotes positive images of women, and helps women to make informed decisions about their future and the future of this country. For these reasons, the Ms. Foundation for Women supports greater diversity in media ownership, employment and programming.

The Ms. Foundation for Women's leadership also understands that the instant proceeding is intended to advance the Commission's examination of cable a la carte, a proposal that would permit consumers to buy cable channels individually rather than in bundles. We believe the proposed legislation would have a significant negative impact on the so-called "niche" networks, such as Oxygen, that cater to particular interests or demographics such as women, minorities, gays and lesbians, and non-English language speaking television viewers. As the record in this proceeding reveals, these programmers view cable a la carte as an extreme threat to their survival. They believe such legislation would undermine existing multicultural networks, erect a substantial barrier to entry for new networks, and erode media diversity.¹

Niche networks that cater to women and other targeted audiences already have a very difficult time securing cable distribution. A la carte would exacerbate this problem and make it more difficult for these cable networks to attract subscribers. If a la carte is enacted, there would be less diversity and fewer channels devoted to women and minorities. As a recent U.S. General Accounting Office report concluded, "some cable networks, especially the small and independent networks would not be able to gain enough subscribers to support the network."²

In keeping with Ms. Foundation for Women's longstanding commitment to women's empowerment and equality, we urge you to heed the concerns expressed by multicultural programmers and civil rights groups regarding the impact of cable a la carte on media diversity and to recommend to Congress that it not be enacted.³ It would be unfortunate if a proposal, which intended to give consumers more choice and control, were to inadvertently reduce diversity in programming and with it the number of women and minority owners, executives and employees in the cable industry.

Sincerely,

¹ See, for example, the letter to the House Energy and Commerce Committee signed by the chief executives of BET Holdings, TV One, the International Channel, and Sí TV.

² Report to the Chairman, Committee on Commerce, Science, and Transportation, U.S. Senate: "Issues Related to Competition and Subscriber Rates in the Cable Television Industry." United States General Accounting Office. Report 04-8: October 2003.

³ Organizations that have expressed concerns about the impact of a la carte on diversity in letters to Congress include the NAACP, the Minority Media and Telecommunications Council, and the National Asian Pacific American Legal Consortium and the Congressional Black Caucus.

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